

In the Matter of:

Jane Doe

v.

UVA

Jane Doe

June 20, 2024



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Jane Doe

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF VIRGINIA
3 Charlottesville Division
4 - - - - - X
5 JANE DOE,
6 Plaintiff,
7 -vs- Case No. 3:23-cv-00018-RSB
8 THE UNIVERSITY OF VIRGINIA,
9 et al.,
10 Defendants.
11 - - - - - X
12 Fairfax, Virginia
13 Thursday, June 20, 2024
14 Deposition of:
15 JANE DOE,
16 the plaintiff, called for examination by counsel on
17 behalf of the defendant, pursuant to notice, taken in
18 THE OFFICE OF THE ATTORNEY GENERAL/FAIRFAX, 10555 Main
19 Street, Suite 350, Fairfax, Virginia, beginning at
20 approximately 10:22 a.m., before Patricia D. Staffa, a
21 Verbatim Reporter and Notary Public in and for the
22 Commonwealth of Virginia at Large, when there were

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1 was a Draft Investigation Report issued to the
2 parties in August -- it says August 25th, 2020.

3 Is it your position that the Draft
4 Investigation Report should have been prepared
5 sooner than August 25th, 2020?

6 A Yeah. As I said, if they had reached
7 out to witnesses earlier, who they were already
8 aware of, given that in my first interview I
9 talk almost strictly about Vienna and Budapest,
10 yeah, they could have done it earlier.

11 Q So to understand the basis for you
12 saying that this draft report should have been
13 done earlier is that you feel that the
14 investigation should have happened sooner?

15 A Yeah. Could have been quicker.

16 Q And do you agree that that's just your
17 opinion?

18 A Yeah, it is my opinion.

19 Q Okay. And you don't have any knowledge
20 about what goes into preparing a Draft
21 Investigation Report?

22 A I've read the whole thing and I put a

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1 lot of attention into the process when I was
2 going through it, especially when the final one
3 came out.

4 Q Uh-huh.

5 A So I'm not an investigator myself, but,
6 you know, I was part of the process.

7 MR. BERNHARDT: Okay. Ms. Doe, I'm
8 going to show you what we're going to mark as
9 Defendant's Exhibit 17.

10 (Whereupon, the document
11 was marked as Defendant's
12 Exhibit No. 17, for
13 identification.)

14 BY MR. BERNHARDT:

15 Q Do you recognize this as being an email
16 sent by Stuart Evans to you on May 29, 2020?

17 A Uh-huh.

18 Q And this is UVA 005146.

19 Is this a fair and accurate copy of the
20 email that Stuart Evans sent you on May 29th,
21 2020?

22 A Yeah.